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cc Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc
Subject Environmental Defense comments on Trimethyl Phosphite (CAS# 121-45-9)

(Submitted via Internet 6/5/06 to boswell.karen@epa.gov, and lan.bartlett@us.rhodia.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for **Trimethyl Phosphite (CAS# 121-45-9).**

The Trimethyl Phosphite Consortium, in response to EPA's High Production Volume (HPV) Chemical Challenge, has submitted a test plan and robust summaries for trimethyl phosphite (TMP).

Our review of this submission indicates that the test plan is generally well-written and referenced and that the IUCLID database files previously submitfed as part of the European Risk Assessment Program on Existing Substances provide adequate robust summaries. Review of the test plan and the IUCLID documents indicate TMP and its hydrolysis product, dimethyl hydrogen phosphite (DMHP), have been subjects of significant study over the past 30 to 40 years. Whereas some of these studies are old and were not conducted under GLP, they appear to be sufficient to address the required SIDS elements. When supplemented with data developed for DMHP as a surrogate chemical, sufficient data are available to address all the required SIDS elements for TMP except for chromosomal aberration. This submission proposes to conduct a study, designed according to OECD guideline 474, that should address this deficiency.

Relatively minor revisions we would suggest in this submission are the following:

1. According to this submission, TMP is produced "primarily outside this country" and imported. The term "primarily" indicates that there is some production in this country as well. These facts indicate that most of this material is transported from the site(s) of import and/or production to the site(s) of use. Therefore, some potential exists for environmental release as a result of a spill in the course of transport, or in the course of synthesis or manufacture of other products, etc. Presumably some measures are taken to limit its release into the environment in the course of its transport, production and use. It would be of interest to include brief descriptions of these measures in the test plan.

2. TMP is used in the production of a number of “phosphorous-containing products” including insecticides, flame retardants and lubricant additives in which it is said to account for “only trace residuals”. However, no estimate of “trace residuals” is provided. This information would be of greater value if some quantitative estimate of these trace residues, e.g., cl%, etc., were provided.
3. In the test plan, the degradation/hydrolysis product of TMP is variously referred to as dimethyl phosphonate and dimethyl hydrogen phosphite. Whereas these are different synonyms for the same chemical, it would be clearer if a single synonym were used throughout this submission.
4. According to the first and fourth columns in the matrix in Table 7, chromosomal aberration data are said to be available. That does not appear to be the case, however, based on data included in the robust summaries.

In summary, studies to address most required SIDS elements, as well as a number of chronic studies, are summarized and well-referenced in this submission. With minor revisions this is an acceptable submission to the HPV Challenge.

Thank you for this opportunity to comment.

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